

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-3664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Yvonne Gonzalez Rogers

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of Plaintiffs' Motion for Class Certification, Dkt. 608 ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Representatives and Class Counsel Pages 2:20, 4:5, 4:18, 15:5, 15:7, 15:11-12, 15:27, 16:1, 16:19, 22:7, 22:26-27, 24:15	Tse Declaration ¶ 4	
[PROPOSED] Order Granting Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel Pages 5:8, 5:23, 16:8-9, 16:11-12, 16:21-22, 22:21	Tse Declaration ¶ 4	
Plaintiffs' Trial Plan in Support of Motion for Class Certification Pages 1:11, 1:16, 3:27-28, 10:5-6, 10:18-27, 11:18-19, 11:25, 13:2, 14:6, 15:8-9, 15:17, 15:24-25, 16:19-21, 18:28, 19:1, 19:14, 20:6-7, 21:23-24	Tse Declaration ¶ 4	
Exhibit 1 to Mao Declaration (GOOG-BRWN-00406065) Pages -6065-6069	Tse Declaration ¶ 4	
Exhibit 4 to Mao Declaration (GOOG-BRWN-00475063) Pages -5063-5064, -5066	Tse Declaration ¶ 4	

1	Exhibit 5 to Mao Declaration (GOOG-CABR-00084985)	Tse Declaration ¶ 4	
2	Page -5043		
3			
4	Exhibit 9 to Mao Declaration (GOOG-CABR-00093167)	Tse Declaration ¶ 4	
5	Entirety		
6	Exhibit 10 to Mao Declaration (GOOG-BRWN-00388293)	Tse Declaration ¶ 4	
7	Page -8295		
8			
9	Exhibit 12 to Mao Declaration (GOOG-BRWN-00140297)	Tse Declaration ¶ 4	
10	Pages -0311-313, -0315-319, -0323,		
11	-0325, -0327-329		
12	Exhibit 14 to Mao Declaration (GOOG-BRWN-00490767)	Tse Declaration ¶ 4	
13	Entirety		
14	Exhibit 18 to Mao Declaration (GOOG-CABR-05836882)	Tse Declaration ¶ 4	
15	Entirety		
16			
17	Exhibit 21 to Mao Declaration (GOOG-CABR-04154452)	Tse Declaration ¶ 4	
18	Entirety		
19			
20	Exhibit 24 to Mao Declaration (GOOG-CABR-05766200.R)	Tse Declaration ¶ 4	
21	Pages -6201.R, -6204.R		
22	Exhibit 25 to Mao Declaration (GOOG-CABR-05150754)	Tse Declaration ¶ 4	
23	Entirety		
24			
25	Exhibit 26 to Mao Declaration (GOOG-BRWN-00166653)	Tse Declaration ¶ 4	
26	Entirety		
27			
28	Exhibit 27 to Mao Declaration (GOOG-CABR-05145513)	Tse Declaration ¶ 4	

1	Entirety		
2	Exhibit 29 to Mao Declaration (GOOG-BRWN-00388293)	Tse Declaration ¶ 4	
3	Page -8295		
4			
5	Exhibit 30 to Mao Declaration GOOG-CABR-00501220	Tse Declaration ¶ 4	
6	Pages -1221, -1222, -1224, -1225		
7	Exhibit 31 to Mao Declaration (GOOG-BRWN-00428101)	Tse Declaration ¶ 4	
8	Entirety		
9			
10	Exhibit 32 to Mao Declaration (GOOG-CABR-03849022)	Tse Declaration ¶ 4	
11	Entirety		
12	Exhibit 33 to Mao Declaration (GOOG-BRWN-00686207)	Tse Declaration ¶ 4	
13	Entirety		
14			
15	Exhibit 36 to Mao Declaration (GOOG-BRWN-00529122)	Tse Declaration ¶ 4	
16	Pages -9122, -9123		
17	Exhibit 37 to Mao Declaration GOOG-BRWN 00176477	Tse Declaration ¶ 4	
18	Pages -6478, -6479, 6480		
19			
20	Exhibit 38 to Mao Declaration (GOOG-CABR-00411915)	Tse Declaration ¶ 4	
21	Entirety		
22			
23	Exhibit 39 to Mao Declaration (GOOG-BRWN-00067645)	Tse Declaration ¶ 4	
24	Entirety		
25	Exhibit 44 to Mao Declaration GOOG-CABR-05371009	Tse Declaration ¶ 4	
26	Pages -1009, -1011,		
27	PDF page 5		
28	Exhibit 46 to Mao Declaration	Tse Declaration ¶ 4	

1	GOOG-BRWN-00047390		
2	Pages -7391, -7395, -7396, -7397, -		
3	7398		
4	Exhibit 51 to Mao Declaration GOOG-BRWN-00182492	Tse Declaration ¶ 4	
5	Page -2492		
6	Exhibit 53 to Mao Declaration Deposition of Rory McClelland	Tse Declaration ¶ 4	
7	Pages 124:5, 132:15, 133:17,		
8	133:20-25		
9	Exhibit 54 to Mao Declaration GOOG-BRWN-00409986	Tse Declaration ¶ 4	
10	Pages -9986-987		
11			
12	Exhibit 55 to Mao Declaration GOOG-BRWN-00477510	Tse Declaration ¶ 4	
13	Entirety		
14			
15	Exhibit 56 to Mao Declaration GOOG-CABR-05126022	Tse Declaration ¶ 4	
16	Page -6023		
17	Exhibit 57 to Mao Declaration GOOG-CABR-05269357.RR	Tse Declaration ¶ 4	
18	Entirety		
19			
20	Exhibit 58 to Mao Declaration GOOG-BRWN-00418249	Tse Declaration ¶ 4	
21	Pages -8249, -8250, PDF p. 4-5		
22	Exhibit 59 to Mao Declaration GOOG-BRWN-00167337	Tse Declaration ¶ 4	
23	Pages -7337, -7339		
24	PDF p. 6-7		
25	Exhibit 60 to Mao Declaration GOOG-CABR-05603788	Tse Declaration ¶ 4	
26	Page -3788, PDF p. 5		
27			
28	Exhibit 61 to Mao Declaration GOOG-CABR-05536108	Tse Declaration ¶ 4	

1	Page -6109		
2			
3	Exhibit 62 to Mao Declaration GOOG-CABR-04803103.C	Tse Declaration ¶ 4	
4	Pages -3103.C-3104.C		
5	Exhibit 64 to Mao Declaration GOOG-CABR-04324934	Tse Declaration ¶ 4	
6	Entirety		
7			
8	Exhibit 66 to Mao Declaration GOOG-BRWN-00390418	Tse Declaration ¶ 4	
9	Pages -0418, -0419		
10			
11	Exhibit 67 to Mao Declaration GOOG-BRWN-00410884	Tse Declaration ¶ 4	
12	Pages -0884, -0885 PDF p. 4-6		
13			
14	Exhibit 71 to Mao Declaration GOOG-CABR-04261880	Tse Declaration ¶ 4	
15	Pages -1880, PDF Page 3		
16			
17	Exhibit 72 to Mao Declaration GOOG-CABR-03923580	Tse Declaration ¶ 4	
18	Pages -3580-584, PDF page 6		
19			
20	Exhibit 73 to Mao Declaration GOOG-CABR-03827263	Tse Declaration ¶ 4	
21	Pages -7263		
22			
23	Exhibit 74 to Mao Declaration GOOG-BRWN-00047399	Tse Declaration ¶ 4	
24	Entirety		
25			
26	Exhibit 75 to Mao Declaration GOOG-CABR-04991831	Tse Declaration ¶ 4	
27	Page -831, PDF Page 4		
28			
	Exhibit 76 to Mao Declaration GOOG-BRWN-00047341	Tse Declaration ¶ 4	
	Page -344		

1	Exhibit 77 to Mao Declaration GOOG-CABR-05269678	Tse Declaration ¶ 4	
2	Page -680		
3			
4	Exhibit 78 to Mao Declaration GOOG-CABR-04798344	Tse Declaration ¶ 4	
5	Entirety		
6	Exhibit 80 to Mao Declaration GOOG-BRWN-00042388	Tse Declaration ¶ 4	
7	Pages -404, -408, -410		
8			
9	Exhibit 81 to Mao Declaration GOOG-CABR-04431207	Tse Declaration ¶ 4	
10	Entirety		
11	Exhibit 83 to Mao Declaration GOOG-CABR-04739841	Tse Declaration ¶ 4	
12	Entirety		
13			
14	Exhibit 84 to Mao Declaration GOOG-CABR-04746153	Tse Declaration ¶ 4	
15	Entirety		
16			
17	Exhibit 86 to Mao Declaration	Tse Declaration ¶ 4	
18	Pages 2:14, 2:20, 2:24-26, 2:28, 3:1,		
19	3:3-10, 3:12-23, 3:27-28, 4:1-4, 6:1,		
20	6:3-4, 6:6, 6:8-11, 6:13-27, 7:1, 7:3-		
21	9, 7:11-26, 8:1-13, 8:15-18		
22	Supplemental Declaration of Martin		
23	Sramek in Response to May 20,		
24	2022 Order		
25	Expert Report of Jonathan E.	Tse Declaration ¶ 4	
26	Hochman		
27	Pages 9, 36, 44-46, 51-56, 59, 61,		
28	63-71, 73-76, 82, 86-91, 93-96, 98-		
	108, 110-112, 115-126, 128-132,		
	134, 136-137, 139, 142, 145, 150,		
	152-154		
	Hochman Appendix A	Tse Declaration ¶ 4	
	Pages 3-4, 15, 19		

1	Hochman Appendix D	Tse Declaration ¶ 4	
2	Pages 1-5		
3	Hochman Appendix E	Tse Declaration ¶ 4	
4	Entirety		
5	Hochman Appendix F	Tse Declaration ¶ 4	
6	Pages 2-10		
7	Hochman Appendix G	Tse Declaration ¶ 4	
8	Pages 1-6, 8-13		
9	Hochman Appendix H	Tse Declaration ¶ 4	
10	Pages 1-30		
11	Hochman Appendix I	Tse Declaration ¶ 4	
12	Entirety		
13	Hochman Exhibit C	Tse Declaration ¶ 4	
14	Entirety		
15	Hochman Exhibit E	Tse Declaration ¶ 4	
16	Entirety		
17	Hochman Rebuttal to Report of Georgios Zervas and Supplemental Report of Jonathan E. Hochman	Tse Declaration ¶ 4	
18	Pages 8-18, 20-23, 26, 28, 30-31, 33, 35-37, 40, 42-44, 48-50, 66-67. 69, 71-74		
19	Hochman Rebuttal Appendix A	Tse Declaration ¶ 4	
20	Entirety		
21	Hochman Rebuttal Appendix B	Tse Declaration ¶ 4	
22	Entirety		
23	Hochman Rebuttal Appendix C	Tse Declaration ¶ 4	
24	Entirety		
25	Hochman Rebuttal Appendix D	Tse Declaration ¶ 4	
26			
27			
28			

1	Entirety		
2	Hochman Rebuttal Appendix E	Tse Declaration ¶ 4	
3	Entirety		
4	Hochman Rebuttal Appendix F	Tse Declaration ¶ 4	
5	Entirety		
6	Hochman Rebuttal Appendix G	Tse Declaration ¶ 4	
7	Entirety		
8	Hochman Rebuttal Appendix H	Tse Declaration ¶ 4	
9	Entirety		
10	Hochman Rebuttal Appendix I	Tse Declaration ¶ 4	
11	Entirety		
12	Hochman Rebuttal Appendix J	Tse Declaration ¶ 4	
13	Entirety		
14	Hochman Rebuttal Appendix K	Tse Declaration ¶ 4	
15	Entirety		
16	Expert Report of Mark Keegan: Rebuttal of Expert Report of Professor On Amir and Appendices	Tse Declaration ¶ 4	
17	Pages 59, 61		
18	Keegan Exhibit 8	Tse Declaration ¶ 4	
19	Pages Keegan_Exhibits_81, 83-87		
20	Expert Report of Michael J. Lasinski	Tse Declaration ¶ 4	
21	Pages: TOC, 1-2, 7, 9-16, 18-59, 65- 67, 73-78, 80-82		
22	PDF Pages (Schedules): 107-178, 180-184, 186-188, 190, 192, 196, 199-203, 205-214, 216-230, 232, 235-239, 241-297		
23	Expert Report of Bruce Schneier	Tse Declaration ¶ 4	
24	Pages 25, 57-59, 73-75, 80, 83, 87,		

1	89-91, 93, 96-97		
2	Expert Rebuttal Report of Bruce	Tse Declaration ¶ 4	
3	Schneier: Rebuttal of Expert		
4	Georgios Zervas		
5	Pages 11-14, 21-25		

6 **SO ORDERED.**

7

8 DATED: _____

9 _____
HON. YVONNE GONZALEZ ROGERS
United States District Judge